

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

X CORP.,

Plaintiff,

v.

WORLD FEDERATION OF
ADVERTISERS; MARS,
INCORPORATED; CVS HEALTH
CORPORATION; ØRSTED A/S; and
TWITCH INTERACTIVE, INC.,

Defendants.

Case No. 7:24-cv-00114-B

**PLAINTIFF’S UNOPPOSED MOTION FOR
LEAVE TO FILE SECOND AMENDED COMPLAINT**

Plaintiff X Corp. (“X” or “Plaintiff”) respectfully files this unopposed Motion for Leave to File Second Amended Complaint (the “Motion”) and urges that it be granted.

In accordance with the schedule set forth in this Court’s January 17, 2025, Order: (a) on January 20, 2025 Plaintiff shared with the existing Defendants a draft Second Amended Complaint; (b) on January 27, 2025, the existing Defendants informed Plaintiff that they do not oppose this motion for leave to amend; and (c) Plaintiff now hereby moves for leave to file the Second Amended Complaint in this action in the form appended hereto as Exhibit A. Counsel apologize for the slight delay in filing this motion. It did, however, allow Plaintiff to finalize agreements with several potential Defendants not named in this suit.

Under Federal Rule of Civil Procedure 15(a)(2), a party may amend a pleading with the opposing party’s consent or the court’s leave. Here, the opposing parties do not object to the motion for leave to amend and, per Rule 15, “[t]he court should freely give leave when justice so requires.” Where, as here, the motion for leave to amend comes before the filing of any responsive

pleadings or motions and before discovery has begun and merely adds additional defendants and factual details, leave is appropriately granted.

Accordingly, Plaintiff respectfully requests that this Court grant it leave to file the Second Amended Complaint.

February 1, 2025

Respectfully submitted.

/s/ John C. Sullivan

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Attorneys for Plaintiff X Corp.

CERTIFICATE OF SERVICE

I certify that on February 1, 2025, a true and correct copy of the foregoing instrument was served on all counsel of record using the Court's electronic filing system.

/s/ John C. Sullivan

Attorney for Plaintiff X Corp.

CERTIFICATE OF CONFERENCE

I certify that counsel for Plaintiff has conferred with counsel for Defendants and Defendants are not opposed to this motion.

/s/ John C. Sullivan

Attorney for Plaintiff X Corp.